NATIONAL CENTER FOR MISSING & EXPLOITED CHILDREN®

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation (PS Docket No. 15-91)

Dear Secretary Dortch:

On Wednesday July 5, 2017, staff from the National Center for Missing & Exploited Children (NCMEC) spoke by phone with several employees of the FCC Public Safety & Homeland Security Bureau to discuss AMBER Alerts and proposals for improving the Wireless Emergency Alert (WEA) system. A detailed summary of the discussion is offered below, and a complete list of the meeting participants follows at the end.

Geo-targeting

NCMEC staff discussed the relative importance of accurate geo-targeting for AMBER Alert messages. In general, NCMEC is supportive of improvements to targeting that may increase the likelihood a WEA message reaches individuals with information about a missing child. However, NCMEC staff reminded the group of the unique nature of AMBER Alerts, which inherently involve a child whose current whereabouts and specific path of travel are unknown. Citing a 2013 AMBER Alert that involved a child abducted in Southern California and eventually recovered in a remote region of Idaho, NCMEC described the potential for rapid movement outside of targeted areas. These factors may require AMBER coordinators to broadcast a more wide-reaching alert than other types of alerts involving weather or public-safety warnings,[1] and a lack of information about the specific geographic location of the abducted child actually illustrates the benefit of enlisting the public's help through a WEA message. NCMEC emphasized the efforts made to help prevent "over-alerting" or "alert fatigue" in the public,[2] and advises AMBER coordinators to include specific information (like vehicle and license plates) to aid in the recovery of the child.

[1] *See* NCMEC Comments, PS Docket No. 15-91, 2 (Jan. 13, 2016)
[2] 179 total AMBER Alerts were issued in the U.S. in 2016.

Alert Preservation

NCMEC described commonly-reported scenarios in which a WEA recipient may need or wish to refer back to the contents of an AMBER Alert (e.g. if it is received while they are driving a car) at a more convenient later time. This forms the primary basis for NCMEC's consistent recommendation that preserving WEA messages on a recipient device provides a public benefit. It is possible that with an increase in the character limits for WEA messages, this ability to review more potentially detailed content multiple times could be even more beneficial in the future. NCMEC does not have a specific time recommendation for how long an alert should remain preserved on a user's device, however staff noted that most AMBER Alerts do not extend beyond a few hours.

Multimedia Alerts

NCMEC remains supportive of providing the public with details (including images) that may help increase the impact of an AMBER Alert, but staff remain cautious about anything that might slow down the dissemination of WEA messages. Time is always of the essence in an AMBER Alert scenario, so NCMEC emphasized other proposed improvements like embedded URLs that could provide recipients with access to much more detail, while keeping the messages simple and quickly-delivered.

Additional Languages and Automation

NCMEC described the usefulness of multilingual message capabilities, particularly to allow AMBER Alerts to reach Spanish-speaking recipients. When asked about whether an automatic or computerized language translation system may be beneficial, NCMEC indicated the need for accuracy and clarity in a small amount of text characters which likely makes it more appropriate for the message originator to provide a translation. Likewise in response to the concept that all AMBER Alert WEA messages might fit into a template format or otherwise be suitable for automation or a universal app that could produce messages, NCMEC emphasized that each missing child scenario is unique. The fact that many current WEA messages often are styled in a similar fashion, is a direct result of the current 90-character limit which leaves very little room for descriptions and often requires abbreviated language (further complicating any concept of automatic translation or message creation).

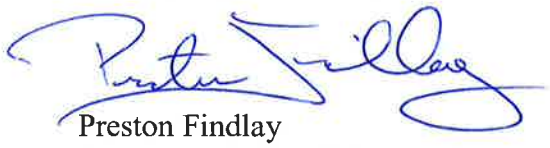
Further Discussion

In response to questions about any lessons that could be drawn from AMBER Alerts and applied to other scenarios like disaster relief, NCMEC indicated the analogy may be limited and not particularly instructive, although we remain willing to provide any helpful information.

NCMEC was asked about the proposal that users who choose to opt-out of receiving WEA messages, could still passively and silently have alerts cached for viewing only if they choose to seek them out. NCMEC is supportive of any suggestions and concepts that could decrease the number of people who opt-out of receiving messages entirely and this proposal may allow someone who previously opted-out to still access information about an AMBER Alert.

As always, the National Center for Missing & Exploited Children appreciates the opportunity to discuss these important issues and to further improve the effectiveness of WEA messages.

Respectfully submitted,



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Meeting Participants:

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